

Attachment B

Additional NESHAP, Subpart S, Subpart MM, and
Subpart JJJJ Requirements

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Chlorine
 Time Period: 3-Hour Average
 Process Unit Description: Bleach Plant Scrubber System

Emission Limits: Scrubber Outlet Conc. <10 ppmv Cl₂ (40 CFR 63.445 (c)(2))

Operating Parameters: Scrubber liquid influent (recirculation) flow > 87 gpm
 Scrubber effluent pH > 10.4
 Scrubber fan operational status - ON

Monitor Manufacturer(s) and Model Number(s): Liquid flow / Foxboro IMT25 PDAD810MAB
 pH / Great Lakes P63AINIAIN 6LZ

Last CMS Certification or Audit Date: Flow Meter Audit (Calibration): 8/26/2020
 pH (Calibration): 8/7/2020

Please note that the bleach plant has been shut down indefinitely as the mill has been reconfigured.

Total Source Operating Time in Reporting Period: 2,304 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Causes	0 Hour
Other Unknown Causes	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.00 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol
 Time Period: 15-day rolling average
 Process Unit Description: Condensate Collection and Treatment System

Emission Limits: Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3))
 Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))

Operating Parameters: Condensate Feed Rate, Condensate Feed Temperature, Steam Flow
 Effective Steam Ratio (condensate feed rate / (steam flow to column
 less steam for condensate preheat) > 16 = 92%

Monitor Manufacturer(s) and Model Number(s): Condensate Flow – Rosemount /3051CD2A22A1JB4L4M6T1F6
 Steam Flow - Rosemount /3051CD2A22A1JB4L4M6T1E5
 Condensate Temperature – Rosemount/3144D5E5B4T1M5

Last CMS Certification or Audit Date: Condensate Flow (calibration): 8/26/2020
 Steam Flow (calibration): 8/26/2020
 Condensate Temperature (calibration): 8/26/2020

Total Source Operating Time in Reporting Period: 2,304 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Fuel Problems	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00%

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	N/A
Non-Monitor Equipment Malfunctions	N/A
Quality Assurance/Quality Assurance Calibrations	N/A
Other Known Cause	N/A
Other Unknown Cause	N/A
Total Number of Incidents	N/A
Percent Monitor Downtime	N/A

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

SEMI-ANNUAL REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Reporting Period: July 1, 2020 through December 31, 2020

Process Unit Description: Condensate Collection and Treatment System

Company: New Indy Catawba LLC – Catawba Mill

Emission Limits: Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3))
Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))

Operating Parameters: Condensate Feed Rate, Condensate Feed Temperature, Steam Flow, Effective Steam Ratio (condensate feed rate / (steam flow to column less steam for condensate preheat) > 16 = 92%

§63.10(c)(5): Date / time during which the CMS was inoperative except for zero and high-level checks:	None
§63.10(c)(6): Date / time during which the CMS was out of control:	None
§63.10(c)(7): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during startups, shutdowns, and malfunction of the affected source:	None
§63.10(c)(8): Specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during periods other than startups, shutdowns, and malfunction of the affected source:	N/A
§63.10(c)(10): Nature and cause of any malfunction:	N/A
§63.10(c)(11): Corrective action taken or preventive measures adopted:	N/A
§63.10(c)(12): Nature of repairs or adjustments to the CMS that was inoperative or out of control:	N/A
§63.10(c)(13): Total process operating time during the reporting period:	2,304 hours
§63.8(c)(7) and (8): Reporting requirements for a CMS that is out of control:	N/A

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Process Unit Description: LVHC System – Combination Boilers

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1% excluding SSM plan excess emissions.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 2,304 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	Duration
	A. Startup/Shutdown	6.48 Hours
	B. Malfunctions	
	Process/Instrument System	1.17 Hours
	Control/Operating/Collection	0.42 Hours
	Other Known Cause	5.83 Hours
	Other Unknown Cause	0.15 Hours
	Total Number of Incidents	36
	Excess Emissions / Process Operating Time	0.61 %
	Total Duration of Excess Emissions excluding SSM	
	Plan Excess Emissions/ Process Operating Time	0.32%

Note: Specific incidents are shown on the attached log for SSM purposes

CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored: Methanol

Time Period: Hours

Process Unit Description: HVLC System – Combination Boilers

Emission Limits: Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4% excluding SSM plan excess emissions.

Operating Parameters: N/A

Monitor Manufacturer(s) and Model Number(s): N/A

Last CMS Certification or Audit Date: N/A

Total Source Operating Time in Reporting Period: 2,304 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	Duration
<i>Note: Specific incidents are shown on the attached log for SSM purposes</i>	A. Startup/Shutdown	5.10 Hour
	B. Malfunctions	
	Process/Instrument System	1.55 Hours
	Control/Operating/Collection	0.0 Hours
	Other Known Cause	2.48 Hours
	Other Unknown Cause	2.22 Hour
	Total Number of Incidents	29
	Excess Emissions / Process Operating Time	0.49%
	Total Duration of Excess Emissions excluding SSM	
	Plan Excess Emissions/ Process Operating Time	0.27%

CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

The location of Subpart MM information is detailed in Table MM-1 below. The information has also been uploaded to CEDRI as a PDF of this document as the 40 CFR §63.867(d)(2) Excess Emissions Report Excel template is in development.

Table MM-1. Subpart MM Information

Equipment ID	Source Description	Subpart MM Information Location
2505	No. 2 Recovery Furnace	Main Report Section TV-2440-0005, Condition C.39
5105	No. 3 Recovery Furnace	Main Report Section TV-2440-0005, Condition C.41
2723	No. 2 Lime Kiln	Main Report Section TV-2440-0005, Condition C.39
2510, 5110	No. 2 and No. 3 Smelt Dissolving Tank Vent	Tables MM-2 and MM-3, below

Table MM-2. Smelt Dissolving Tank Opacity Monitoring

Process Unit Description:	No. 2 and No. 3 Smelt Dissolving Tank Vent
Pollutant:	Particulate Matter
Time Period:	Hours
Emission Limits:	0.2 lbs/ton BLS
Operating Parameters:	Differential Pressure > 1.5 inches of water column Liquid Flow Rate > 65 gpm
Monitor Manufacturer(s) and Model Number(s):	DP – Rosemount 3051CD2A02A1AM5E55 Liquid Flow Rate – Foxboro IMT25PDAB10N-AB
Last CMS Certification or Audit Date:	Certification: August 3, 2004 (both) Audits: DP – Rosemount: 5/11/2020 Liquid Flow Rate – Foxboro: 5/18/2020
Total Source Operating Time in Reporting Period:	2,304 hours

Table MM-3. Smelt Dissolving Tank Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	Duration (hrs)	
	Differential Pressure Duration (hrs)	Liquid Flow Rate Duration (hrs)
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	0	0
Excess Emissions/Process Operating Time	0.00%	0.00%
Monitor Downtime Summary		
Reason for Monitor Downtime	Duration (hrs)	
Monitor Equipment Malfunctions	0	19.00
Non-Monitor Equipment Malfunctions	0	0
Quality Assurance	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	0	1
Percent Monitor Downtime	0.00%	0.82%

The No. 2 Paper Machine was indefinitely idled in June 2017, with no anticipated re-start date. No. 1 Paper Machine has been idle for several years. Therefore, there was no activity related to Subpart JJJJ during the semi-annual period.

Source	Description of Compliance	Operating Time (hrs)	Description and Cause of Deviations
No. 1 Paper Machine Coater	Each coating material as-applied contains less than 0.04 kg organic HAP per kg coating weight.	0	No deviations occurred during reporting period.
No. 2 Paper Machine Coater	Each coating material as-applied contains less than 0.04 kg organic HAP per kg coating weight.	0	No deviations occurred during reporting period.